

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In Re:)	Case No. 14-48397
)	Chapter 13
Billie Long)	
)	
)	Notice of Filing
Debtor)	Motion to Impose the Stay
)	
)	Judge Surratt-States, CR 7 N
)	November 17, 2014 10:00 a.m.

NOTICE OF MOTION TO EXPEDITE HEARING AND IMPOSE THE STAY

PLEASE TAKE NOTICE, that a Motion to Impose the Stay with regard to all property in their bankruptcy has been filed in the instant case and will be called for hearing before the Honorable Judge Surratt-States, Thomas Eagleton Building (U.S. Courthouse), 111 South Tenth Street, Courtroom 7 North.

WARNING: Any response or objection must be filed with the Court. A Copy may be promptly served upon the undersigned. Failure to file a timely response may result in the Court granting the relief request prior to the hearing date.

/s/ Sean C. Paul
Sean C. Paul,59371MO
8917 Gravois Rd
St. Louis MO 63123
314-827-4027
314-222-0619 FAX
scp@stlbankruptcyfirm.com

Certificate of Service

The undersigned certifies that a true copy of Debtors' Motion to Impose the Automatic Stay was served via first-class mail, postage prepaid, or by the court's ECF system on November 5, 2014, to all parties on the attached list.

/s/ Sean C. Paul
Sean C. Paul

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MOTION TO EXPEDITE HEARING

COMES NOW, the debtor, Billie Long, and presents this motion to expedite the hearing, and in support thereof, states:

1. Debtor has had three cases pending in the last 12 months.
2. Debtor has no stay in this case and must have a hearing on her Motion to Impose the Stay within 30 days of the case filing.
3. As such, this is an emergency situation and a Motion to Expedite the Hearing should be granted.

Wherefore, Debtor prays this court enter an order granting the Motion to Expedite the hearing on the Motion to Impose the Stay.

/s/ Sean C. Paul
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MOTION TO IMPOSE THE BANKRUPTCY STAY

COMES NOW, the above Debtor, and present this Motion to Impose the Automatic Stay:

1. Debtor filed the above captioned case in good faith on October 24 2014.
2. Debtor had two prior case pending in the last 12 months: case 13-41580 and case 14-45943, both of which were dismissed for debtor's failure to make plan payments.
3. Pursuant to 11 U.S.C. 362(c)(4), the debtor does not have an Automatic Stay, but "if, within 30 days after the filing of the later case, a party in interest requests the court may order the stay to take effect in the case as to any or all creditors...after notice and a hearing, only if the party in interest demonstrates that the filing of the later case is in good faith as to the creditors to be stayed."
4. Debtor has had a significant change in circumstances and can show that her financial affairs have changed such that the current case is not filed in bad faith:
 - a. The prior case provided for retaining and paying for a financed vehicle through the plan;
 - b. On the eve of debtor's prior bankruptcy filing the car was repossessed;
 - c. Debtor was unable to pay for the storage costs required to get her vehicle out;
 - d. Although debtor tried to make arrangements to get to work, she was put in a major financial hardship due to not having a vehicle;
 - e. As such, the prior case failed;
 - f. Debtor has secured financing for a new vehicle, and, although she has not purchased it, she has adequate transportation to work, and a reduced plan payment in the present case in anticipation of filing a motion to incur debt.

WHEREFORE, Debtor respectfully prays that this court enter an order imposing the stay to the conclusion of the case.

/s/ Sean C. Paul

Sean C. Paul, 59371MO

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St. Louis MO 63123

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Label Matrix for local noticing
0865-4
Case 14-48397
Eastern District of Missouri
St. Louis
Thu Oct 30 12:33:16 CDT 2014

Advance America Cash Advance
3861 Lemay Ferry Rd.
Saint Louis, MO 63125-4535

(p)AAA CHECKMATE LLC
7647 W 63RD ST
SUMMIT IL 60501-1811

Advance Credit
3723 Gravois Ave.
Saint Louis, MO 63116-4667

Ace Cash Express
3655 S. Grand Blvd.
Saint Louis, MO 63118-3430

Advance Me Today
PO Box 1124-1007
San Jose, Costa Rica 10102

America Web Loan
522 N 14th St.
PO Box 130
Ponca City, OK 74601-4654

Ameriloan
3531 P Street NW
PO Box 111
Miami, OK 74355-0111

BANK OF AMERICA
PO BOX 84006
COLUMBUS, GA 31908-4006

BARCLAYS BANK DELAWARE
125 S WEST ST
WILMINGTON, DE 19801-5014

Brothers Loan & Finance Co
327 Missouri Ave. Ste. 504
East Saint Louis, IL 62201-3088

Brothers Loan & Finance Co
7621 West 63rd St.
PO Box 396
Summit Argo, IL 60501-0396

(p)CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

(p)CASHCALL INC
1 CITY BOULEVARD WEST
SUITE 1000
ORANGE CA 92868-3611

CCS/CORTRUST BANK
500 E 60TH ST N
SIOUX FALLS, SD 57104-0478

CHASE
P.O. BOX 15298
WILMINGTON, DE 19850-5298

CREDIT ONE BANK
PO BOX 98875
LAS VEGAS, NV 89193-8875

Cash Jar
PO Box 025250
Miami, FL 33102-5250

Classic Group
PO Box 411056
Kansas City, MO 64141-1056

Collector of Revenue
1200 Market St #410
Saint Louis, MO 63103-2841

Commerce Bank
1000 Walnut
PO Box 419248
Kansas City, MO 64141-6248

ELECTRO CU
1805 CRAIGSHIRE DR
ST LOUIS, MO 63146-4019

HORIZON CARD
1707 WARREN RD
INDIANA, PA 15701-2423

HSBC BANK
PO BOX 5253
CAROL STREAM, IL 60197-5253

IRS
PO Box 7346
Philadelphia, PA 19101-7346

KOHL'S/CAPONE
N56 W 17000 RIDGEWOOD DR
MENOMONEE FALLS, WI 53051-7096

King of Kash
8304 Wornall Rd.
Kansas City, MO 64114-5810

LVNV FUNDING LLC
PO BOX 740281
HOUSTON, TX 77274-0281

METABNK/FHUT
6250 RIDGEWOOD ROA
SAINT CLOUD, MN 56303-0820

MISSOURI PAYDAY LOANS
3715B S KINGSHIGHWAY BLV
SAINT LOUIS, MO 63109

Missouri Department of Revenue
P.O. Box 475
Jefferson City, MO 65105-0475

Missouri Payday Loan
3717 S. Kingshighway Blvd.
Saint Louis, MO 63109-1803

Money Loans Quick
382 NE 191st St, Suite 67786
Miami, FL 33179-3899

OAK HARBOR CAPITAL VII, LLC
C O WEINSTEIN, PINSON, AND RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Office of US Trustee
111 S Tenth St, Ste 6.353
St. Louis, MO 63102-1127

Pay Day Max
207-1425 Marine Dr.
W. Vancouver, BC, Canada
V7T1B9

Pay Day Max
23-845 Dakota St
3212 Winnipeg, Manitoba, Canada
R2M5M3

(p)PLANET CASH JC MANAGEMENT LLC
PO BOX 220309
ST LOUIS MO 63122-0309

Progressive Financial
11629 South 700 East Ste. 250
Draper, UT 84020-8399

Quik Cash
2615 Gravois Ave.
Saint Louis, MO 63118-1502

Riverbend Cash
3201 Summerhill Road
Texarkana, TX 75503-3967

SALLIE MAE
PO BOX 9500
WILKES BARRE, PA 18773-9500

(p)SPRINGLEAF FINANCIAL SERVICES
P O BOX 3251
EVANSVILLE IN 47731-3251

United Cash Loans
3531 Northwest P Street
PO Box 111
Miami, OK 74355-0111

WEBBNK/FHUT
6250 RIDGEWOOD ROA
SAINT CLOUD, MN 56303-0820

Billie R. Long
3627 Dunnica Ave
St Louis, MO 63116-4901

John V. LaBarge Jr
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143-0908

Sean C. Paul
The Law Offices of Sean C. Paul, PC
8917 Gravois Rd
2nd Floor
St. Louis, MO 63123-4623

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

AAA Checkmate
327 Missouri Ave. Ste. 412
East Saint Louis, IL 62201

(d)AAA Checkmate
7647 West 63rd St.
Summit Argo, IL 60501

CAP ONE
PO BOX 85520
RICHMOND, VA 23285

CASHCALL INC
1600 S DOUGLASS RD
ANAHEIM, CA 92806

Planet Cash
3823 S. Kingshighway Blvd.
Saint Louis, MO 63109

SPRINGLEAF FINANCIAL S
4600 CHIPPEWA ST STE P
SAINT LOUIS, MO 63116

End of Label Matrix
Mailable recipients 47
Bypassed recipients 0
Total 47